

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 26, 266 & 406

**CERTIFICATION OF COUNSEL**

I, Kimberly A. Brown, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 17, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of an Order (I) Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Granting Certain Related Relief* [D.I. 26] (the “Motion”).

2. On December 21, 2022, the Debtors filed with the Court the *Supplement to Motion of Debtors for Entry of an Order Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports* [D.I. 266] (the “Supplement to Motion”).

3. On January 4, 2023, the United States Trustee (the “U.S. Trustee”) filed the *Objection of the United States Trustee to Motion of the Debtors to Extend Time to File Schedules*

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

*of Assets and Liabilities, Statements of Financial Affairs, and Rule 2015.3 Reports* [D.I. 364] (the “U.S. Trustee Objection”).

4. On January 4, 2023, the Ad Hoc Committee of Customers and Creditors of FTX Trading Ltd. and Its Affiliated Debtors and Debtors-in-Possession (the “Ad Hoc Committee”) filed the *Objection of the Ad Hoc Committee of Customers and Creditors of FTX Trading Ltd. and Its Affiliated Debtors and Debtors-in-Possession to the Debtors’ Motion for Entry of an Order Extending the Time to File Schedules and Statements* [D.I. 370]. On January 10, 2023, the Ad Hoc Committee filed a *Notice of Withdrawal of Docket No. 370* [D.I. 456] withdrawing its objection.

5. On January 8, 2023, the Debtors filed the *Debtors’ Reply in Support of Motion of Debtors for Entry of an Order (I) Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Granting Certain Related Relief* [D.I. 406] (the “Reply”). The Debtors filed as **Exhibit 1** to the Reply a revised proposed form of order (the “Order”).

6. The Debtors received informal comments (the “Informal Comments”) from the Official Committee of Unsecured Creditors (the “Committee”).

7. The Debtors have further revised the Order (the “Revised Order”), to resolve the U.S. Trustee Objection and the Informal Comments, a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the Order attached to the Reply is attached hereto as **Exhibit B**.

8. The Revised Order has been circulated to the Ad Hoc Committee, the U.S. Trustee and the Committee (collectively, the “Parties”). The Parties have advised that they do not object to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

9. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: January 10, 2023  
Wilmington, Delaware

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